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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY:

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

07 CR 3221 JM

UNITED STATES OF AMERICA,)	Criminal Case No. _____
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	
v.)	Title 31, U.S.C.,
)	Secs. 5316(a)(1)(A) and
JESUS GOMEZ-FELIX,)	5324(c)(1) - Failure to File
)	Reports on Exporting Monetary
Defendant.)	Instruments; Title 31, U.S.C.,
)	Sec. 5332(a) - Bulk Cash
)	Smuggling; Title 31, U.S.C.,
)	Secs. 5316, 5317(c)(1) and 5324,
)	5332(a)(1), (b)(2) and (c)(3) -
_____)	Criminal Forfeiture

The grand jury charges:

Count 1

On or about November 14, 2007, within the Southern District of California, defendant JESUS GOMEZ-FELIX, knowingly and with intent to evade the reporting requirements of Title 31, United States Code, Section 5316, did transport and was about to transport more than \$10,000 in monetary instruments, to wit, approximately \$15,680.00 in U.S. currency, at one time from a place in the United States to or through a place outside the United States, to wit, the Republic of

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JJO:em:San Diego
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CR

1 Mexico, without filing the report required by Section 5316; in
2 violation of Title 31, United States Code, Sections 5316(a)(1)(A)
3 and 5324(c)(1), and Title 31, Code of Federal Regulations,
4 Section 103.23(a).

5 Count 2

6 On or about November 14, 2007, within the Southern District of
7 California, defendant JESUS GOMEZ-FELIX, with the intent to evade a
8 currency reporting requirement under Title 31, United States Code,
9 Section 5316, did knowingly and intentionally conceal more than
10 \$10,000 in United States currency, to wit, a total of approximately
11 \$15,680.00, concealed on his person, and transported, transferred or
12 attempted to transport or transfer such currency from a place within
13 the United States to a place outside the United States, to wit, the
14 Republic of Mexico; in violation of Title 31, United States Code,
15 Section 5332(a).

16 **FORFEITURE ALLEGATION**

17 1. The allegations contained in Counts 1 and 2 are realleged
18 and by reference fully incorporated herein for the purpose of alleging
19 forfeiture to the United States of America.

20 2. As a result of committing the offense of failing to file a
21 currency report as alleged in Count 1, defendant JESUS GOMEZ-FELIX
22 shall forfeit to the United States all property, real and personal,
23 involved in said offense and all property traceable to such property,
24 including but not limited to, \$15,680.00 in United States currency;
25 all in violation of Title 31, United States Code, Sections 5316
26 and 5317(c)(1).

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